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## Evaluating the Effectiveness of U.S. Anti-Slavery Legislation through the Lens of Supply Chain Management

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## Abstract

Whether knowingly or unknowingly, business supply chains are often tainted with slavery and forced labor practices. In an effort to address this reality, the California Transparency in Supply Chains Act of 2010 (CTSCA) requires companies in California to publish a statement disclosing companies' efforts to prevent this potential abuse. This study evaluates the effectiveness of the California legislation by observing media trends and collecting expert interviews and data from business leaders, academics, and legislators. The data reveals both strengths and weaknesses in the California bill, which informs future attempts to create anti-slavery legislation addressing corporate supply chain abuses. The CTSCA is not likely to eliminate the problem of slavery in corporate supply chains, yet it plays an integral and pioneering role in the advent of conversations about corporate social responsibility and the role of businesses in the fight against this abuse.

## Acknowledgements

I wish to express gratitude for my professors that assisted in this endeavor, especially for the patience of my advisor, Professor Tony Talbott, as well as for the interviewees and all those that cared to listen to me talk about this project for the past two years.



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## Introduction

Modern day slavery, in the forms human trafficking and forced labor, has emerged as a global problem in recent decades. It has received much attention from government entities, academics, advocacy organizations, and civil society as a whole. Academic studies use a variety of approach across several disciplines to understand, document, analyze, and seek solutions for the problem—from political science, sociology, criminal justice, clinical psychology and even operations (Konrad et al., 2017). This wide swath of approaches seems comprehensive, yet this assumption is misleading. In fact, accurate data is hard to come by. The data on human trafficking in all its forms is often distorted by different ideologies, and the international definition of trafficking is slightly vague and unclear (Loff and Sanghera, 2004). The International Labour Organization (ILO) estimated that in 2016, 40.3 million people are in modern slavery, of which 21 million are forced laborers (2017). While the ILO's estimates are among the most reliable sources, it remains just an estimate due to the secretive and deceptive nature of the problem. Despite this lack of accurate and unbiased data describing the modern day slavery, scholars and advocates are determined to address this hidden issue.

A particularly difficult facet to address is modern day slavery found in corporate supply chains. This slavery, usually in the form of forced labor or debt bondage, is often buried deep within supply chains, muddying the waters of liability and accountability in corporate practices. Americans generally understand that products should not be made using labor that is forced, coerced, or otherwise carried out by unwilling subjects. Despite this understanding, corporate malpractice and negligence has led to the phenomenon of forced labor, compounded by a disconnection between the laborer and

employer created through a system of complex supply chains and labor contractors. The California Transparency in Supply Chains Act of 2010 (SB 657) (hereafter the CTSCA) is an attempt to create policy that addresses the risk of slavery in corporate supply chains by encouraging consumer participation and corporate accountability. While the CTSCA seeks to remedy the all forms of trafficking and encourage companies to take action, we must ask: is it realistically effective in its intent to encourage consumer awareness and corporate responsibility? In order to evaluate the effectiveness of this bill, I analyze media coverage of issues related to forced labor in two California based news outlets, *The Mercury News* and *The Orange County Register*. The results suggest that the CTSCA has only minimal impact on the coverage of issues related to forced labor. In addition, expert interviews reveal both critiques of the bill's major weaknesses and high hopes for the CTSCA and similar future legislation. This study is broken down into three main sections as follows: a review of literature, data analysis and discussion, and conclusion.

## **Literature Review**

The political response to human trafficking in the United States since the early 2000s has amplified the attention and resources allocated for addressing the problem on an international scale, especially with the passage of the TVPA in 2000 (DeStefano, 2008; Miko, 2004; Stoltz, 2007). Much of the scholarship and political attention in the United States focuses specifically on human sex trafficking, more so than labor trafficking—a consequence of intentional framing from interest groups and politicians (Feingold, 2005; Gulati, 2010; Marchionni, 2012; Weitzer 2007; Zimmerman, 2005). As a consequence of narrow framing of human trafficking in the United States, many sources

focus on the criminalization and prosecution of sex traffickers while seeking to enhance responses from law enforcement (Welson and Dalton, 2008). In addition, scholarship documents the problems and complexities of human trafficking and modern day slavery (Bales et al. 2009; Kangasputa 2003; Kligman and Limoncelli 2005; Skinner 2009), while other studies explain causes (Firman and Reich 2007; Gallagher 2006; Kyle and Koslowski 2001). More specifically, some scholars point to an increased demand for forced labor on a global scale, driven by immense profitability and corporate neglect of supply chains (Kara, 2011; Kligman and Limoncelli, 2005; Skeldon 2000).

### *Media*

Media also plays an important role in the response to modern day slavery. A series of studies show mass media's ability to significantly impact public opinion on a given issue, particularly through its agenda-setting function (McCombs and Shaw 1972; McCombs 2003; Kosho 2015). When mass media covers issues relating to modern day slavery, public opinion reflects trends in coverage of those same issues. Specific to our study, some studies show that media coverage of issues related to human trafficking is focused predominantly on mainstream views that reinforce politicians' strategies, leaving out minority voices in solution proposals (Gulati 2008, 2010; Johnston et al. 2014; Marchionni 2012; Kingdon 2011). This also suggests that media follows major trends in political discourse, especially reflecting majority frames within political discussions.

### *Corporate Social Responsibility Approaches*

This study is situated amid this vast swath of literature, focusing mainly on a solution-seeking model, rather than identifying the problem or explaining the causes. Of particular interest are the attempts at remediating a specific form of modern day slavery: labor abuses within corporate supply chains. There is a growing body of literature that supports a corporate social responsibility (CSR) approach as a solution. Studies suggest that businesses and their legal teams have a responsibility to monitor supply chains in order to attract conscious consumers, investors, and shareholders (Johnson Jr., 2013). In addition, corporate theories of liability used in human trafficking and forced labor cases are inadequate in holding corporations legally liable for contractors' actions (Bang, 2012), and joint corporate and individual liability can deter forced labor (Dryhurst, 2012). Finally, direct sourcing is seen as another beneficial corporate strategy because it gives businesses an opportunity to form mutually beneficial relationships with suppliers (Zolkos, 2014). Corporate social responsibility is growing in its relevance in public discourse, especially in public policy.

### *Public Policy Approaches*

The formation of anti-slavery public policy is another approach to combat modern day slavery and forced labor. The UK Modern Slavery Act of 2015 is one example of a policy-related approach to human trafficking solutions. Enacted in 2015, the policy strengthens the United Kingdom's ability to respond to cases of slavery (Cranmer 2016). Other public policy measures use corporate social responsibility as a platform for combating slavery. In 2012, the United States saw a series of public policy measures

seeking to bring the business world into the fight against human trafficking and forced labor (Kendall et al., 2013). The California Transparency in Supply Chains Act of 2010 (SB 657) was one of those measures, entering into force in 2012. The bill is a pioneering piece of legislation in the world of anti-human trafficking measures and corporate social responsibility legislation, because legislation in the United States did not formerly include any provisions that mandated a corporate response to forced labor.

### *The CTSCA*

In its infancy, the CTSCA was championed by the president and founder of the Alliance to Stop Slavery and End Trafficking (ASSET) Campaign, Julia Ormond. Ormond, an advocate for the eradication of slavery and exploitation of human persons in all its forms, led advocacy efforts for the CTSCA. Also a famous British actress, she used her public spotlight to generate support for the bill, and brought it to the California State legislature. The following is a statement about the CTSCA on ASSET's website:

ASSET was the Chief Organizational Sponsor and Original Sponsor of the California Transparency in Supply Chains Law. As ASSET's Founder Julia Ormond was the driving force behind California's groundbreaking 'California Transparency in Supply Chain Act.' She brought the idea to me as leader of the California Senate. She led the advocacy team in Sacramento during the many long months it took to pass the Act. When many doubted its passage, she persisted. The Act is the catalyst for the dramatic progress in recent years to improve compliance with international standards prohibiting human trafficking and slavery. Simply put, but for Julia's direct leadership and work, it never would have happened" -Darrell Steinberg , California Senate President pro Tempore and the leader of the majority party in the California State Senate from 2008 to 2014. (CA TISC)

Darrell Steinberg introduced the bill in February of 2009. The bill was passed by the legislature and signed by California governor Arnold Schwarzenegger in September of

2010. Within the text of the CTSCA, the California State Legislature recognized that slavery and human trafficking are expressly prohibited in international, federal, and state law, but that businesses and consumers are inadvertently promoting these illegal actions through poorly informed purchasing and consumption practices, as well as a corporate neglect of labor abuses deep in the supply chain (Steinberg, 2010). To address this reality, the bill operates as a consumer education tool, since consumers are at a disadvantage when evaluating the efforts of a company to source products and materials ethically and responsibly. The bill states:

SEC 2. (i) Absent publicly available disclosures, consumers are at a disadvantage in being able to distinguish companies on the merits of their efforts to supply products free from the taint of slavery and trafficking. Consumers are at a disadvantage in being able to force the eradication of slavery and trafficking by way of their purchasing decisions. (j) It is the policy of this state to ensure large retailers and manufacturers provide consumers with information regarding their efforts to eradicate slavery and human trafficking from their supply chains, to educate consumers on how to purchase goods produced by companies that responsibly manage their supply chains, and, thereby, to improve the lives of victims of slavery and human trafficking. (Steinberg, 2010)

The CTSCA requires all retail and manufacturing companies making over \$100 million annual worldwide gross receipts and doing business in the state of California to publicly disclose to what extent, if any, the company expresses effort in five separate categories:

(1) Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party. (2) Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit. (3) Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. (4) Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking. (5) Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and

slavery, particularly with respect to mitigating risks within the supply chains of products. (Steinberg, 2010)

The California Revenue and Taxation Code prevents public disclosure of tax information of companies in California, which obstructs general access to a list of companies required to comply with this act (Revenue and Taxation Code, 1998). However, a study from 2017 identified 3,336 companies are actively complying with the law (Bayer and Hudson, 2017).

It is important to note that this bill did not pass unopposed. The California Grocers Association (CGA) and the California Manufacturers and Technology Association (CMTA) argued that resource limitations and unclear legal requirements would make the bill an unnecessary burden on these companies (Gebauer, 2011). However, the California Department of Justice, in 2015, published a resource guide for the CTSCA--likely a response to criticisms that compliance guidelines were unclear. The document provides recommendations for disclosure statements, and clearly defines the expectations laid out in the CTSCA (Harris, 2015).

If a company fails to comply with the requirements in the CTSCA, that company is subject to “an action brought by the Attorney General for injunctive relief” (CTSCA). The meaning of “injunctive relief” is unclear and confusing in its practical application, yet there are three potential forms that could be imposed for violating the act: (1) a court order compelling the company to place the required information on their website, possibly accompanied by a monetary fine, (2) blocking the company’s website from being broadcast in California, and (3) prohibiting a company from conducting business in California until it complies (Greer, 2018). All three are possibilities, but the first is considered the mostly likely form (2018).

*Critical Analysis of the CTSCA*

Prior to my full discussion of this study's methodology and results, I will highlight literature that critically analyzes the CTSCA and seeks to answer, using different methodology, questions that are similar to the guiding questions of this study. In November 2011, Verite published a paper entitled "Compliance is Not Enough: Best Practices in Responding to The California Transparency in Supply Chains Act" (Verite, 2011). This report, published just two months before the CTSCA went into effect, asserted that mere compliance with the Act would not be enough to ensure the elimination of forced labor in the supply chain. Rather, Verite proposes a system of detection, assessment, and auditing to enhance the requirements laid out in the CTSCA (2011). Detection requires a full understanding of the factors that lead workers into forced labor, while assessment and auditing allows companies to identify where workers are forced or coerced to work against their will (2011). In summary, Verite argues that companies should go beyond the requirements laid out in the CTSCA in order to effectively combat forced labor and other forms of slavery in their supply chains.

Also in 2011, Miguel Gonzales Marcos, in a brief article about the CTSCA, voices concern over a potential flaw in the bill. He claims, and rightly so, that the CTSCA relies on "an environment of consumer awareness" in order to properly operate-- the bill would be ineffective in a society without conscious consumers (Marcos, 2011). Additionally, he expresses some support for the bill as it targets businesses in a way that takes advantage of pre-existing standards of corporate social responsibility.

Taking on a slightly different tone, Kendall et al. identifies the CTSCA as an important law for recruiting business in the fight against human trafficking in supply

chains (2012). The authors include the CTSCA among other anti-slavery measures (the Executive Order Against Human Trafficking in Government Contracts and the pending Federal Business Transparency on Trafficking and Slavery Act, as well as other less known measures) from 2012 with the “objective of eradicating human trafficking from global supply chains” (Kendall et al, 2012). The tone of this evaluation is more favorable toward the CTSCA and its requirements than Verite’s 2011 assessment.

Other work in 2011 was instrumental in guiding companies toward full compliance with the guidelines laid out in the CTSCA. The Interfaith Center on Corporate Responsibility (ICCR), in cooperation with socially responsible investors, published a guide titled “Effective Supply Chain Accountability: Investor Guidance on Implementation of The California Transparency in Supply Chains Act and Beyond,” a document laying out the requirements of the CTSCA as well as additional measures for companies to take to strengthen policies combating risks in the supply chain. This guide, similar to Verite’s, advocates for a robust response that goes beyond merely complying with the bill, and provides several examples of companies responding with good practices (ICCR, 2011). Pickles and Zhu (2013) also detail companies’ responses to the CTSCA. Hewlett Packard, PUMA, General Electric, and Agilent Technologies are among the few companies the authors highlight as models for responsible supply chain monitoring (Pickles and Zhu, 2013). It is important to note, however, that these assessments are based solely on the companies’ websites, rather than through a third-party evaluation.

Prokopets (2014) evaluated the effectiveness of the CTSCA using a pre-existing framework for successful supply chain transparency regulation and found that the CTSCA only met three of five necessary components in that framework. Additionally,

the article found that “information disclosed under the CTSCA regime is unlikely to become adequately embedded in users' routine decision-making to affect the purchase of goods, a necessary aspect for success” (Prokopets, 2014). Prokopets also acknowledged the transnational significance of the bill--it requires foreign companies doing business in California to comply with the disclosure requirements, which has wide reaching implications for the beginning of an international disclosure regime (2014). However, she is clear in cautioning against such widespread disclosure regulation without considering the shortcomings of the CTSCA and how those shortcomings can be strengthened (2014).

In 2015, KnowtheChain published a brief analysis of the CTSCA's performance, five years after it was passed in 2010 (not after it entered into effect in 2012). In this report, KnowTheChain found that of the 500 companies it identified as subject to the bill, 47 percent did not meet the minimum requirements for compliance in all five categories required by the law (“Five Years...”, 2015). The report recommends that future transparency laws should more carefully consider the complexities of business supply chains and create legislations that reflects those complexities, especially requiring specific strategies for monitoring supply chains according to the differences found in industry supply chains (2015). The report concludes that the CTSCA creates open conversations about supply chain transparency, allowing for a reevaluation of responsible supply chain management (2015).

Also in 2015, Ashley Feasley authored an article describing the impact of disclosure measures aimed at creating supply chain transparency in both Brazil and the United States (Feasley, 2015). In this comparison, Feasley notes the most important differences in the efforts to create disclosure regimes--in Brazil, the penalties are much

steeper than in the U.S., because the U.S. law relies on creating incentives rather than criminalizing bad actors (2015). The article is clear in pointing out the potential barriers to enforcing disclosure measures, especially the potential for a lack of cooperation from businesses in supporting these measures and the lack of political will to create enforceable and meaningful policies (2015).

It should be noted that literature is still forthcoming, with new discussions regarding supply chain transparency and disclosure regimes being published every year. The last section of this review of literature will cover two recent reports, both published in 2017. In addition, both reports are primarily concerned with the CTSCA. Benjamin Thomas Greer, the former Special Deputy Attorney General in the California Department of Justice, published an article in 2017 entitled “Opaque Transparency: Why California’s Supply Chain Transparency Act is Unenforceable” (Greer, 2017). In this article, Greer explains the lack of understanding regarding the CTSCA’s primary (and only) enforcement mechanism--injunctive relief filed by the California office of the Attorney General. Essentially, Greer argues that this mechanism is difficult to enforce because the application of injunctive relief relies primarily on a court’s decision and interpretation of injunctive relief. However, in the conclusion of the article, Greer acknowledges the importance of disclosure mechanisms as part of a systemic approach to combat slavery in supply chains (2017).

In the second article from 2017, Bayer and Hudson analyze the differences in corporate compliance with the CTSCA between the years 2015 and 2016. The report found a 23 percent increase in the number of companies with a disclosure statement from 2015 to 2016 (Bayer and Hudson, 2017). While the report finds that many disclosure

statements lack all of the necessary requirements, there is an clear improvement over time. The executive summary of the report states the following as a conclusion:

Overall, we find that many companies in focus have demonstrated improvement. More companies have a statement, more are compliant with the law, and more pro-active initiative is being taken by individual businesses in their efforts to responsibly produce and source goods which they sell in California. Those that still have gaps to fill may learn from their peers. (2017)

This study is an important follow up to the CTSCA, especially since it highlights specific company responses, allowing consumers to track company compliance. However, the report does not measure the extent to which consumers access and incorporate these disclosure statements into their decision making processes when purchasing from these companies. The purpose of my study, in part, is to explore that question by analyzing trends in media and public awareness about forced labor and surrounding issues.

## **Data Analysis**

In order to seek answers about the CTSCA's impact on consumer involvement, I identified two different sources of data to use in the analysis. The first source is a quantitative study of public awareness surrounding issues related to forced labor. The second source is a series of qualitative interviews with experts in business, academic, and advocacy fields. My initial hypotheses are as follows. It is important to note that hypotheses I and II are primarily tested under methodology I, while hypothesis III is primarily tested under methodology II and the discussion of literature.

### *Hypotheses*

- I. If the CTSCA is effective in increasing public knowledge, this will be reflected in an increase in amount of media coverage of the issue.
- I. If the CTSCA effectively increased public knowledge of supply chains and labor trafficking, then newspaper reporters will increase in their knowledge as well, yielding a more sophisticated level of reporting on the issue.
- II. If the CTSCA is an effective bill, business leaders, policy makers, and advocates would agree that it substantially influences corporate practices aimed at eliminating slavery in the supply chain.

### *Methodology I*

It has long been shown that media significantly impacts public opinion on a given issue through its agenda-setting power, as was notably studied by McCombs and Shaw (1972). As was indicated in my hypothesis, I predicted that the passage of the CTSCA would increase media coverage of topics related to forced labor, thereby illustrating an increased public awareness of the issue. Reporters would also demonstrate increasing sophistication of reporting around the time of passage of the act or subsequent to the passage of the act. Increasing reporter sophistication is defined by the usage of more than one search term in a single article. An educated and aware consumer base would likely use the CTSCA disclosure statements as aids in purchasing decisions, while increasing sophistication in reporting would indicate sustained public interest in the issues. The methodology for testing these hypotheses and results follow.

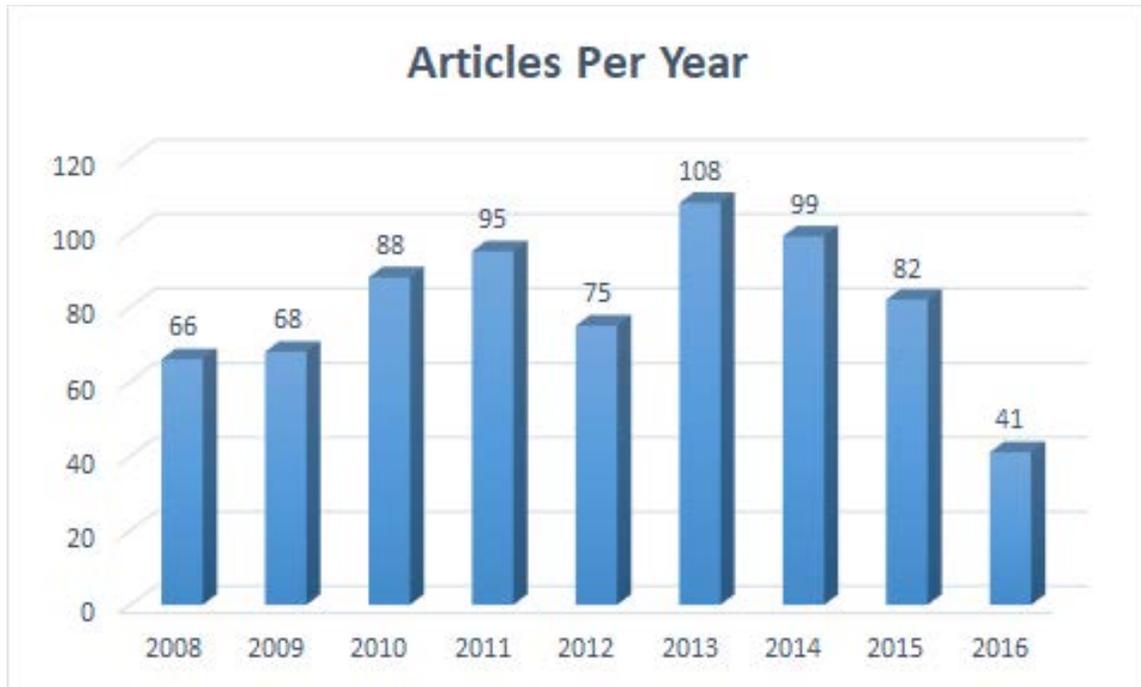
Using Lexis-Nexis Academic database, separate searches were conducted of two California-based news outlets--*The Orange County Register* and *The Mercury News*. We hypothesized that the California-based outlets would best reflect events regarding the passage and implementation of the California Transparency in Supply Chain Act of 2010. Each search included the following terms: (labor traffic!, forced labor!, child labor!, fair trade, sweatshop, debt bondage, corporate social responsibility, and transparency in supply chains). Articles, editorials, and blogs published between the dates of January 1, 2008 and December 31, 2016 were included, and the results were manually recorded in Google Sheets, sorted by date. Each article was coded for date, publication name, word count, and search terms.

After conducting initial searches and recording all data in Google Sheets, the research team determined that each article must be important and relevant to the study in order to be considered in the concluding data analysis, especially after discovering irrelevant results in the Lexis-Nexis searches. After discovering this problem, each article was twice reviewed by trained research assistants, and each assistant used a system of criteria to determine the relevance of each article.

Of the original 958 article results, 236, or 24.6 percent, were deemed 'not relevant' by the research team. Articles deemed 'not relevant' were those where search terms appeared accidentally, or were used out of the context of forced labor. 'Relevant' articles were those about or directly referencing one of the search terms in a legitimate (related to forced labor), educated, and knowledgeable manner. Non-relevant articles were subsequently not used in the data analysis section, leaving 722 total articles for the analysis. 101 of the 722 relevant articles did not contain a search term within the main

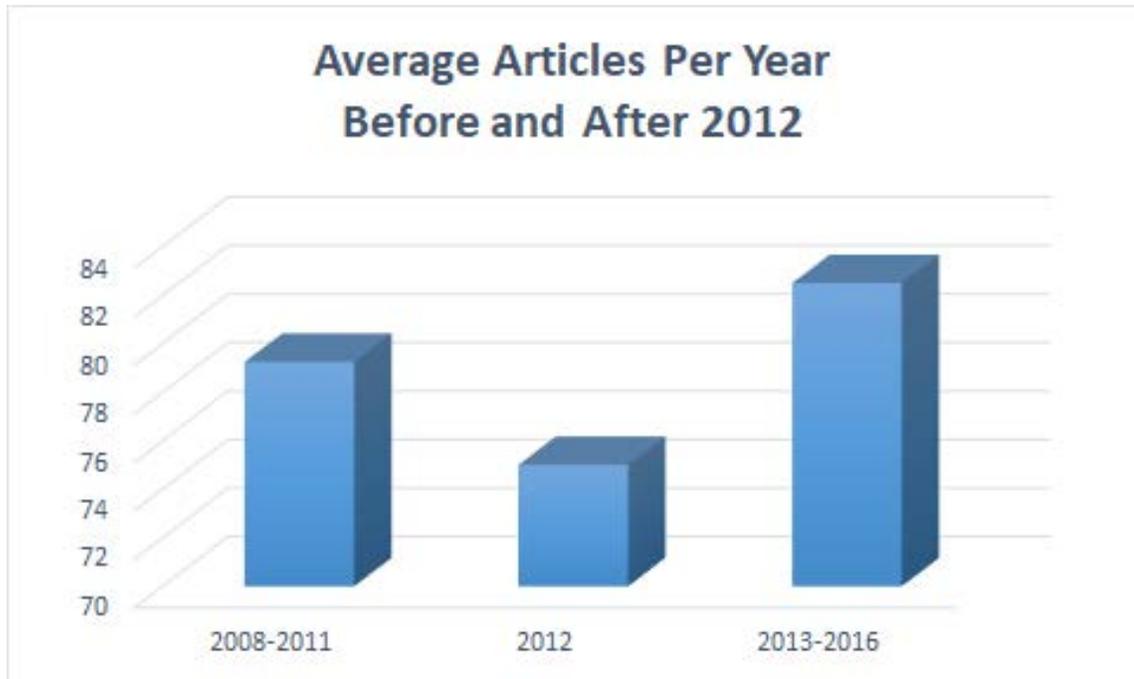
body of the article, yet the article topics were directly related to the study. All results were entered into Google Sheets, exported into Microsoft Excel, and analyzed using IBM SPSS version 24.

### *Analysis and Discussion*



*Figure 1*

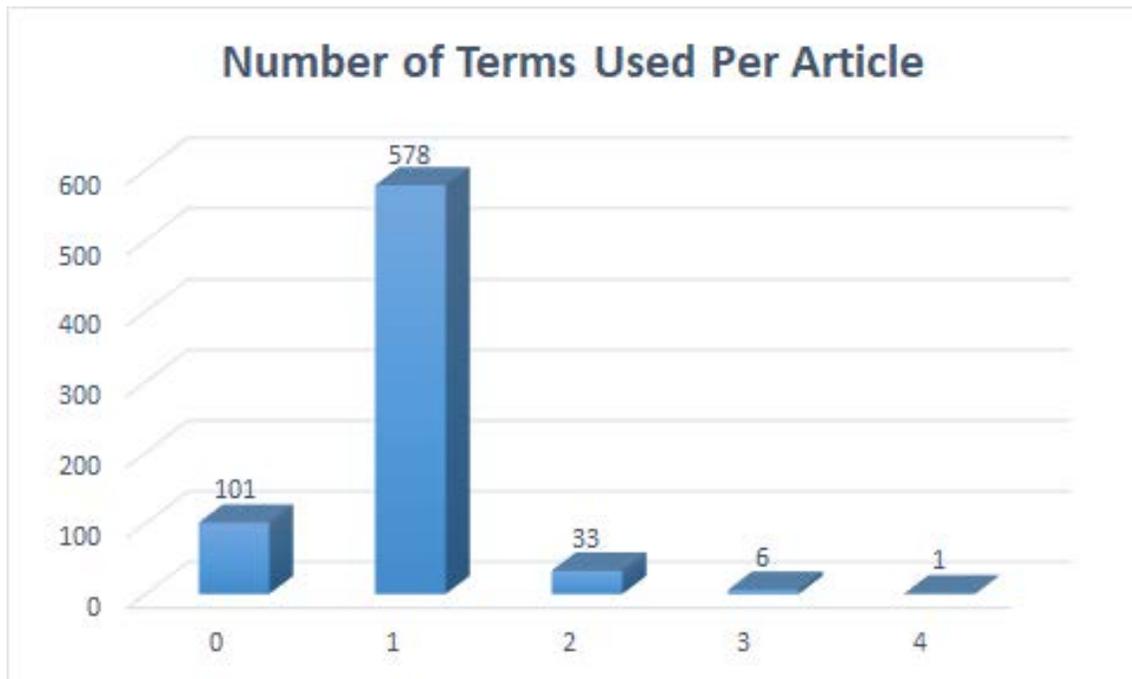
Figure 1 indicates the number of articles per year within the search results. The data shows a steady increase from 2008 until 2011 in the number of articles containing any number of the search terms. In 2012, the number of articles decreases before sharply peaking in 2013. Between 2013 and 2016, the number of articles per year steadily decreases.



*Figure 2*

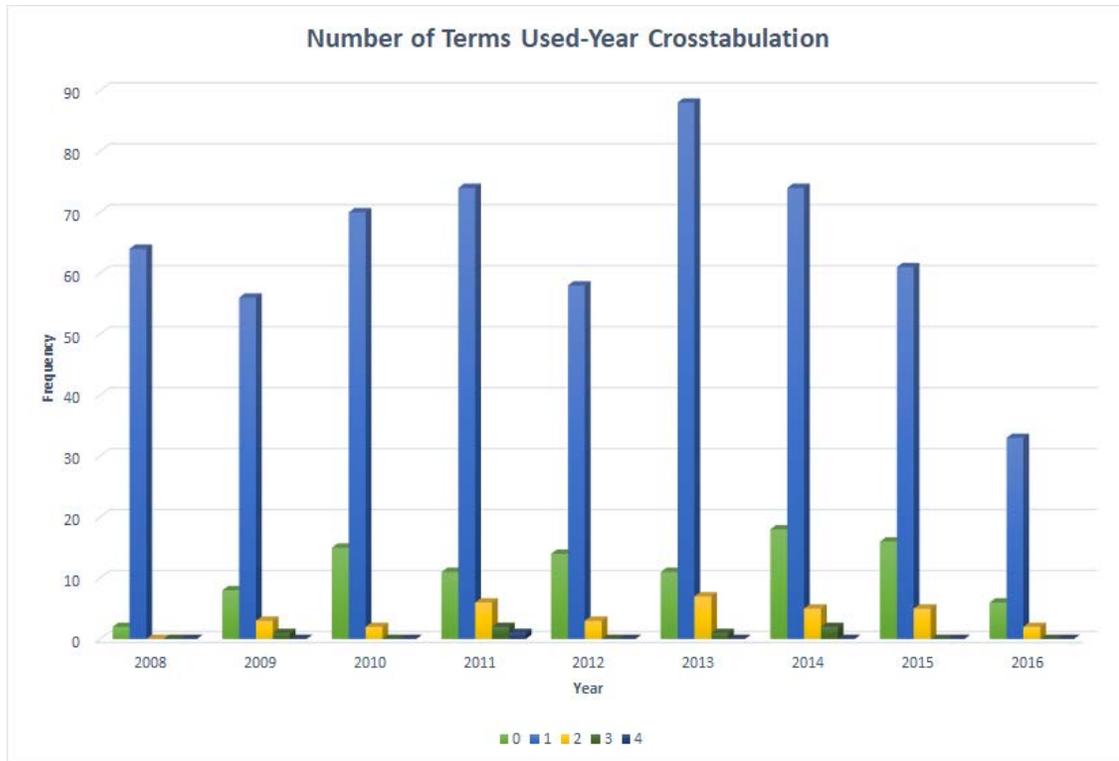
Figure 2 indicates the average number of articles before and after 2012. The California Transparency in Supply Chain Act of 2010 was signed in 2010 and enacted in 2012. The results indicate there was a slight increase in the average number of articles per year, from 79.25 from 2008-2011 to 82.5 from 2013-2016. The slightly higher number of articles in the 2013-2016 period suggests that the passage and implementation of the California Transparency in Supply Chains Act could have been the catalyst for an increase in media coverage. Curiously the number of articles published in 2012 is significantly lower than the averages of the 2008-2011 and the 2013-2016 periods. One possible explanation is that covering the 2012 presidential election took away from coverage on less salient issues, such as supply chains. Literature suggests that presidents have the capacity to set media agendas and frame political issues (Peake and Eshbaugh-Soha, 2008). While no literature specifically covers media coverage of particular issues during election years, presidential candidates likely have similar agenda setting tools

throughout their campaigns. This hypothesis, of course, requires further study to evaluate. Another possible explanation is that 2012 coverage of issues related to human trafficking is an aberration in the data caused by another news event or series of events. These possible explanations, however, are simply conjectures. Further study is required to determine the nature of this drop in coverage.



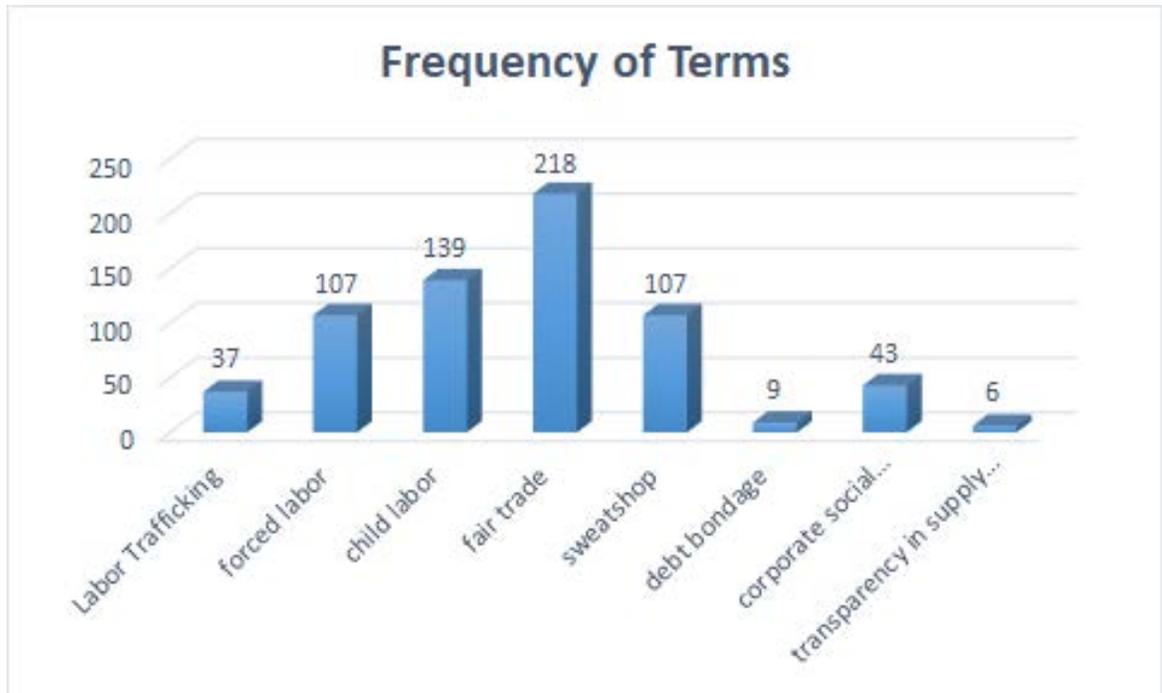
*Figure 3*

Figure 3 shows the number of terms used per each article. 80% of the articles analyzed used only 1 term; 94% of articles using more than 0 terms used 1 term. This data indicates that reporter sophistication (using multiple terms in a single article) is low overall.



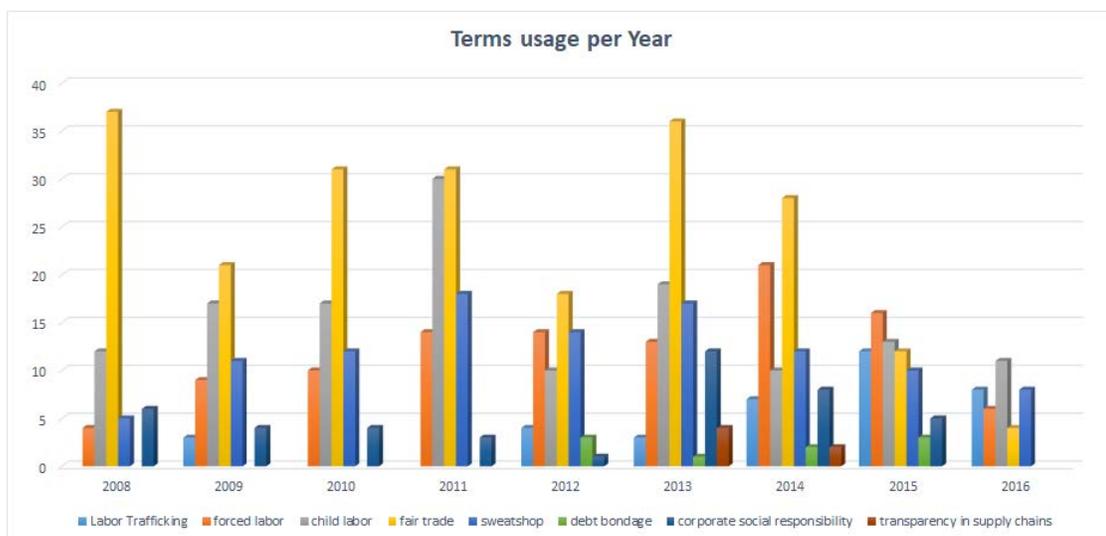
*Figure 4*

Figure 4 shows the number of terms used per article, by year. There is no observable upward trend in the number of articles using two or more terms after the enactment of the CTSCA. Rather, the data is fairly consistent between years, reflecting the curve of Figure 1. Each year, 0 terms occupies about 14 percent of the total number of articles for that year, 1 term occupies about 80 percent, 2 terms occupies about 5 percent, 3 terms occupies about 1 percent, and 4 terms occupies 0.1 percent. This data disproves our prediction that reporter sophistication would increase after the passage of the bill. According to our hypothesis, the media data would show an increase in the sophistication of reporters' coverage of these topics over time. This was not observed.



*Figure 5*

Figure 5 indicates that “fair trade” was the most commonly used term among all 722 articles, followed by “child labor”, “forced labor” and “sweatshop”. The other terms occurred significantly less.



*Figure 6*

According to figure 6, there are a few interesting trends that emerge in the usage of terms over time. There is no significant increase in the term “transparency in supply chains”, yet it only occurs in 2013 and 2014. “Fair trade” is the most common term every year except 2015 and 2016. “Debt bondage” only appears after 2012. “Labor Trafficking” occurs significantly more often during and after 2012 in comparison to before 2012.

According to hypothesis I, the passage of CTSCA, if effective, increased the number of articles relating to the CTSCA in California media outlets. Therefore, we would see higher publication numbers after the passage of the act. As figure 1 demonstrates, the number of articles generally follows an upward curve until 2013, and then follows a downward curve until 2016. This suggests that coverage increased after 2012--the year the bill entered into effect. However, there is no clear indication that coverage steadily increased either during or after 2010 (when the CTSCA was passed) or 2012 (when the CTSCA became effective). Rather, the spike in coverage in 2013 suggests a brief increase in public awareness and attention to issues relating to forced labor after the bill entered into effect.

Additionally, hypothesis II claims that reporter sophistication increases following the passage of the CTSCA, meaning that reporters would gain increasing understanding of topics covered in our search terms. None of the data indicates an increase in reporter sophistication over time. The data displayed in figure 3 and figure 4 both show strikingly low levels of sophistication--a clear majority of articles only use one of the search terms. Additionally, while there are a few interesting trends in figure 6, the data lacks significant trends that would illustrate an increase in coverage of the search terms as related to the passage of the CTSCA.

### *Limitations of Media Data*

When using this media data, there are a few limitations we should consider. First, according to Gulati's (2010) thesis, mass media primarily reflects and emphasizes mainstream views when covering human trafficking. Forced labor, in comparison to sex trafficking, is not currently considered a part of mainstream views by both the media and policy makers. While public conversation in the United States about modern day slavery is increasingly expanding to include slavery in all its forms, it is likely that media framing of the issue generally favors coverage related to sex trafficking rather than forced labor. This would help to explain the absence of meaningful results in my analysis of the media data.

In addition, a more complete analysis of data was impossible due to time constraints, especially considering the time necessary to eliminate irrelevant articles from the initial Nexis-Lexis search results. With additional time, more articles could be analyzed from a wider variety of news outlets, including *The New York Times*, *The Chicago Tribune*, *USA Today*, among others, to allow a more comprehensive analysis of media trends across the entire United States.

### *Methodology II*

In addition to analyzing trends in the media, I conducted interviews and gathered expert testimony in order to supplement our understanding of the CTSCA from existing literature. In choosing interviewees, I identified three categories or fields: business leaders, scholars/advocates, and legislators, particularly those that worked with or have extensive knowledge of the CTSCA. These categories were identified because these

professionals most likely have had some significant interaction with the bill. I wanted to know how business leaders, advocates, and legislators view the CTSCA. The interviews gave us valuable and candid perspectives from two of the categories--business leader and scholar/advocate. I was unable to secure an interview with a legislator, so public statements from a legislator regarding transparency regulation is used instead.

Using a set of interview questions, two one-on-one interview sessions were conducted. Both interviews were conducted in a private space and audio recorded, supplemented by handwritten interviewer notes. The following analysis and discussion breaks down each of the three different perspectives regarding the CTSCA and supply chain transparency regulation in general.

### *Business Leader*

The first interview was conducted with Peter McGrath, the former executive vice president of JC Penney. His insights reflected his many years of experience in the corporate world. I have broken up this interviewee's comments into three sections: first are comments on the realities of the business world, second are comments regarding opinions of the CTSCA, and third are recommendations for eliminating forced labor from supply chains. The following is a summary of his reflections in his voice, and exact quotations are indicated by quotation marks:

Overall, it is important to understand that we know so little about other universes. Government operates in a different universe than business, which operates in a different universe than natural science, which operates in a different universe than law. Forced labor has been a concern in the garment industry for almost 40 years now, and today it is

pretty much eradicated. This is because the garment industry has gone through a series of changes amplified by a model of constant improvement. These changes have impacted all of the major players, and pressure to ensure transparency and eradicate forced labor is higher than ever. The bigger the organization, the more pressure there is to promote visible supply chains.

While the bigger industries have worked diligently to clean up their supply chains, the highest risk lies with the smaller companies and tier 4 factories that lie deep within the supply chain. These bad actors are in the bottom 5 percent of all the actors in this industry, and exploit human beings while circumnavigating the law. In addition, there are industries that are at much greater risk, such as agriculture, cattle, pig iron, etc., because supply chain visibility has not yet emerged fully in those industries.

While the CTSCA was well intended and well understood, the bill fails to catch the bad actors in the bottom 5 percent of garment industry. “I never even blinked at that piece of legislation...it was never something we had to take into consideration.” This is because we were already serious about creating supply chain visibility from within. In addition, a federal bill that mirrors that CTSCA would have the same problem as the CTSCA itself. As a result, the good actors would find the bill an unnecessary burden.

Finally, legislation need not always be a burden for companies. More comprehensive legislation can promote good practices and punish bad actors. This legislation can make it easier for business to create change from within, especially through shareholder advocacy, corporate social responsibility, and advocacy groups. Promoting change internally is the most effective way to ensure clean supply chains and eliminate forced labor.

*Scholar/Advocate*

The second interview was conducted with Valentina Gurney, a shareholder and investor advocacy professional with many years of work in the field of corporate social responsibility and human rights. Her interview reflected her expertise in these fields and provided valuable insight from an academic/advocate's perspective. The following is a summary of her reflections in her voice, and exact quotations are indicated by quotation marks:

Overall, there has been a shift in norms regarding business supply chain transparency and visibility. Of the businesses that are occasionally connected to labor abuses in the supply chain, many do so unknowingly. Therefore, it is important to educate businesses on the risks, and work with them to create meaningful policies that encourage suppliers to adhere to strict standards of ethical conduct. Certifications from suppliers and corporate reporting practices, as well as auditing practices do not always function perfectly, yet they can work to create meaningful accountability structures within businesses. A combined approach, "through every channel possible", is the best way to ensure a thorough and responsible system of values in a corporation.

The CTSCA supplements vendor contracts, training materials, and supplier code of conduct statements that collectively function to reinforce these values. "We rejoiced when California passed that act, because it was the first legislative measure to push companies to be more responsive and transparent, and it cemented the fact that forced labor is a huge problem in the modern economy." If this was not in law, companies can act as good citizens and practice due diligence, but its legal force motivates companies to pursue these values.

A federal bill would further the positive effects of the CTSCA, and smaller companies should not be excluded from the requirements. In addition, adding strong enforcement mechanisms would go a long way in ensuring clarity and visibility within supply chains. Finally, advocates must learn to listen to those they work with they protect, especially being attentive to cultural values and the unique challenges different workers face all over the world.

### *Legislator*

The third and final component of this section is not based on an interview, due to difficulties in securing an interview with a legislator. For this section, I will use two documents from that express views from Rep. Carolyn Maloney (NY-12) and Rep. Chris Smith (NJ-04), the primary sponsors of the Business Supply Chain Transparency on Trafficking and Slavery Act of 2015 (H.R.3226) (introduced in the 114th session of Congress). This bill, like the CTSCA, requires companies with an excess of \$100 million in gross receipts to disclose any measures that aim to prevent slavery in the supply chain. These disclosures would be part of the companies' annual reports to the Securities and Exchange Commission (Maloney, 2015).

Rep. Maloney offered the following comments on the Bill, reflecting the view of legislators that support this measure. The first quotation comes from the Media Center on Rep. Maloney's website, and the second is from Maloney's introductory statement for H.R.3226 in the United States House of Representatives:

This legislation simply requires businesses to publicly disclose what actions they have voluntarily undertaken to remove labor abuses from their supply chains. It is a good first step we can take to improve reporting and transparency so that we can

enforce existing laws against labor abuses and allow consumers to make more informed decisions. (Maloney, 2015)

The Business Supply Chain Transparency on Trafficking and Slavery Act doesn't tell businesses what to do, but rather informs consumers what they are doing to eliminate human slavery from their supply chains. This legislation would help inform consumers where and how their goods are made. While there are good actors, there are businesses operating in parts of the world that rely on enslaved humans to produce their products. We believe American consumers have a right to know who these companies are. This legislation creates a market-based solution rather than relying on prescriptive action by the federal government. Large global companies already reporting to the Securities and Exchange Commission (SEC) simply need to include what they are doing to rid their supply chains of human slavery and post this information on their company websites. Consumers will be empowered to make their purchasing decisions based on the information provided. Very simply, this bill creates an incentive to improve practices to end slavery. (Congressional Record, 2015)

Rep. Chris Smith also offered some thoughts on the effectiveness of transparency regulation legislation:

The bottom line is there is no excuse for a company's complicity or ignorance in the suffering endured by human trafficking victims hidden away in the supply chain. It is not enough for a company to say they are unaware of human trafficking in their product line; consumers and Congress want to know that companies are actively taking steps to ensure there are no connections between human trafficking victims and their business products and services. (Maloney, 2015)

H.R.3226 did not pass through committee deliberation in the 114th session of Congress, and it the bill has yet to be reintroduced. The current political climate and political will do not suggest that the bill will be reintroduced anytime soon. However, advocates can focus efforts on garnering more political support for the bill in future attempts.

In summary, according to the business leader, advocate, and legislator perspective, the CTSCA and similar transparency regulation legislation has a positive effect on creating meaningful disclosure requirements for companies, which contribute to a growing framework for expressing company values and efforts to eliminate slavery in

supply chains. However, transparency regulation legislation is not without its flaws, including minimal enforcement mechanisms, and the potential for excluding bad actors from the legal requirements in the legislation.

### *Limitations of Interviews*

While the interviews are valuable supplements to my review of literature and data analysis, it is important to note the limited sample size of the interviews. This interview data is not meant to be quantitative, but rather supplemental and qualitative. A quantitative survey of public opinion regarding the CTSCA was not feasible for this study, considering the large amount of data collection that undertaking would require.

## **Conclusion**

In May of 2013, the Council on Foreign Relations held a workshop on business and human rights and “the importance of corporations grappling with the risks and responsibilities associated with their supply chains” (“Business and Human Rights”, 2013). During the workshop, participants from the U.S. Departments of State and Labor, congressional staff, academic and policy analysts, as well as human rights nonprofits discussed the barriers businesses face when attempting to discover exploitation in far-reaching global supply chains and best practices already employed by companies (2013). The workshop participants also noted that there is a growing consciousness surrounding human rights abuses within global supply chains, amplified by public attention, media attention, and governments’ desires to regulate. This is but one example of similar workshops and academic work that bring together multiple sectors, seeking to address the

problem of human trafficking and exploitation in supply chains. This growing consciousness is reflected in legislation similar to the CTSCA, including the formerly pending bill in the U.S. House of Representatives, H.R.3226, as well as the UK Modern Slavery Act, both previously discussed in this paper. In addition, the growing consciousness will likely inspire future anti-trafficking measures from governments and companies.

While this study fills only a small lacuna in the present body of literature on this topic, it reveals that the CTSCA is more limited in effectiveness than our hypotheses I and II would suggest. The media data shows an increase in coverage related to the search terms after 2012, but reporters do not demonstrate any significant increase in sophistication. Additionally, the expert interviewees and prior scholarship suggest that the CTSCA is well intended, but lacks the strength to create any substantial change in business supply chains as-is. However, the CTSCA, while not as impactful as many human rights advocates would hope, appears to be part of a much broader movement. If the bill has accomplished any concrete goals, it has, as many of the most recent reports would suggest (Greer, 2017; Bayer and Hudson, 2017), changed the way we think about combatting this issues. We are now encouraged to see modern day slavery, especially slavery in business supply chains, as a complex issue that must be addressed holistically and comprehensively. The CTSCA has opened conversations about the role that disclosure of corporate practices, consumer demand, and corporate social responsibility play in this broad picture of modern day slavery.

The only way to fully understand the full scope of the impact of the CTSCA, and similar legislation, additional research must be done to develop measurements of its

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effectiveness. This study is a piece in the broader picture of anti-slavery legislation that attempts to eliminate exploitation within corporate supply chains. Further study will help in understanding the full scope of consumer engagement and advocacy activities made possible by the CTSCA's disclosure statements. In addition, a longitudinal study of media coverage, especially prior to 2008, could help develop a broader picture of the evolution of corporate social responsibility norms in the past several decades. As we have found in this study, the CTSCA is fairly ineffective in isolation, and only minimally engages consumers in their decision making practices. However, the bill has generated discussion and reflection across many sectors that invites new responsible supply chains management practices aimed at eradicating slavery in corporate supply chains.

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